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February 3, 2012

Puget Sound Partnership Leadership Council C/O Gerry O'Keefe, Director P.O. Box 40900 Olympia, WA 98504-0900

Via email actionagenda@psp.wa.gov

RE: Washington Farm Bureau Comments on the Puget Sound Partnership's 2012 Draft Action Agenda

Director O'Keefe:

Sincerely,

On behalf of farmers and ranchers across Washington state and our more than 41,000 member families, I would like to thank you for the opportunity to comment on the Draft Action Agenda update for the Puget Sound Partnership, a 523-page document that most citizens and leaders of this state will find too lengthy and too detailed to read.

Having been an elected official responsible for oversight of a school district and a county, I can assure you that even the most committed and policy-oriented public servants will find this document to be little more than a door-stop or shelf rock.

The size of this document is perhaps as much of a hindrance to its acceptance as is some of the focus and content.

On Page 4 of the draft executive summary, one of the three example initiatives is listed as "protection of water quality and nearshore habitat from rural and agricultural runoff." But there

does not appear to be discussion of assessment and first establishing factual information on existence and sources of such runoff.

For decades, I have seen agencies rush to implement programs to correct actions without first establishing the existence, extent and source of the problems. The most likely result of this approach is resentment and suspicion from the very people who are needed as partners.

State agencies were recently reported as being off by significant factors in their portrayal of pollutant in Puget Sound. This has brought into question the credibility of the data, science and promoters of actions that have been portrayed as necessary to avoid a crisis.

Credible data, science and administration are necessary to engage the full public in actions.

One of the "proposed priority science questions from 2011-2013" (p. 5) is to "use social science to guide development of adaptive management structures that can effectively link restoration science to management decision-making."

Which social science(s) are referred to? Economics? History? Political science? Psychology? Sociology?

This statement is simply unclear and can lead some to suspect the actual goals are being intentionally made vague.

The "2012 Funding Action" section raises several concerns, and we find the concerns recurring throughout the document.

In this section and Table 4, we find a major focus on passing new programs, promoting the agenda and programs of activist organizations, and acquiring interest in real property. Among the concerns are proposed actions and measures to:

- Promote and rely upon an advocacy organization to investigate a Department of Defense Program
- Study potential tax and fee increases at the local government level
- Lobby for new programs and money
- Increase state funding for regulatory programs
- Allow non-profits to use bonds to buy commercial forestlands
- "Rapidly acquire properties" that are currently in agricultural production

Throughout the document, there are references to preservation of farmland and forestland, but only one apparent reference to maintaining and enhancing the viability of natural resource industries like agriculture and forestry. Maintaining and enhancing these industries – major portions of the Washington economy – is one of the goals of the Growth Management Act. It should also be a priority for the Puget Sound Partnership.

The stated near-term action is for Ecology, Agriculture and the Conservation Commission to convene a series of workshop to engage agricultural stakeholders to identify needs for

maintaining the health of the industry and to identify key areas where the agricultural industry can assist in the protection and restoration of Puget Sound.

It is critical to recognize that health of the agricultural industry *must* involve less regulatory interference, ending government policies that take agricultural land out of production, and an iron-clad commitment that governmental action (regulations, eminent domain, agency land purchases, etc.) will no longer reduce the acreage or productive capacity of our farms.

There is ample reference in the document to the preservation of ecologically valuable lands, but no apparent reference to the current ecological benefits provided by farms.

Floodwater dispersal, fish & wildlife habitat, open space, view sheds, water filtration, and many more benefits are provided by our farms.

Surely, there should be some recognition in the plans of the Puget Sound Partnership that farms are far more beneficial and preferable than urbanized development that paves over the land, creates runoff, removes habitat and excessively applies pesticides beyond label recommendations.

There are *some* helpful concepts in the draft plan.

The agricultural community has advocated for years that CREP, EQUIP and other conservation programs needs to be more flexible so that they work with agricultural activities in our state. We appreciate the inclusion of that concept in the draft plan.

There are references to developing pilot programs for ecological services provided by farms and forests. Those are also welcome suggestions.

We also welcome references to voluntary program, such as the Voluntary Stewardship Program (ESHB 1886). Washington Farm Bureau was involved in the creation of the VSP, worked for legislative passage and spent a great deal of time promoting the opportunity to county officials.

In all considerations, the Puget Sound Partnership must consider the impact of government actions on working farms and forests.

These lands must stay in the hands of the private sector, which has a far greater track record of balanced management and stewardship than the public sector.

And the PSP should keep in mind that acquiring control of more lands – whether the title remains in the name of an agency or is transferred to non-profit organizations – is not good for the economy, for food and fiber protection, for the cost of government or for the health of the land resources.

Governments at all levels have struggles maintaining the health of their current lands. We should not add more burden to government operations, should not cause economic harm by

damaging the tax base or employment, and should not harm the public interest by interfering with the production of necessary food and fiber resources.

In summary, this draft action plan:

- Is too lengthy to engage necessary partners
- Is too focused on new laws, regulations and massive expenditures
- Fails to consider elements necessary for promoting viable agriculture and forestry
- Does not provide a focus on establishing credible data so that solutions are realistically paired with actual problems and sources of those problems.
- *Does* contain some conceptual references to voluntary programs.

This document is not ready for adoption and begs for serious revisions.

Washington Farm Bureau stands ready to help modify the provisions of the plan to ensure the plan is balanced and serves to help ensure that natural resource industries continue to thrive.

Sincerely,

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